

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Terrestrial Use of the 2473–2495 MHz Band for)	IB Docket No. 13-213
Low-Power Mobile Broadband Networks;)	RM-11685
Amendments to Rules for the Ancillary Terrestrial)	
Component of Mobile Satellite Service Systems)	
 Amendment of Parts 1, 21, 73, 74 and 101)	
Commission's Rules to Facilitate the Provision of)	WT Docket 03-66
Fixed and Mobile Broadband Access, Educational)	
and Other Advance Services in the 2150–2162)	
and 2500–2690 MHz Bands)	

To: The Commission

EIBASS *Ex Parte* Comments

1. Engineers for the Integrity of Broadcast Auxiliary Services Spectrum (EIBASS) hereby respectfully submits its *ex parte* comments in response to the July 9, 2014, *ex parte* filing of Iridium Constellation LLC (Iridium) to the IB Docket 13-213 rulemaking regarding the Terrestrial Low-Power Service (TLPS) and Advanced Wireless Service Band 5 (AWS-5) proposed by Globalstar, Inc. (Globalstar).

I. Iridium's Spectrum Charts Fail To Show *Co-channel* TV BAS Allocations

2. EIBASS is disappointed to see that the spectrum charts submitted by Iridium fail to show 2.5 GHz TV Broadcast Auxiliary Services (BAS) operations. Although the Iridium slides show Broadband Radio Service (BRS) Channel 1* and 2,400–2,483.5 MHz Part 18 Industrial, Scientific and Medical (ISM) operations, it fails to show TV BAS Channels A8 (2,450–2,467 MHz) and A9 (2,467–2,483.5 MHz), and grandfathered TV BAS Channel A10 (2,483.5–2,500 MHz). Also missing is 2,400–2,483.5 MHz Part 15 Wi-Fi, although 2.4 GHz Wi-Fi is discussed in the text portion of the Iridium *ex parte* filing.

* With BRS Channel 1 mislabeled as 2,495–2,500 MHz when it is actually 2,496–2,502 MHz.

EIBASS *Ex Parte* Filing to IB Docket 13-213
Terrestrial Low-Power Service/Advanced Wireless Services Band 5 (TLPS/AWS-5)

3. EIBASS is therefore making this instant *ex parte* filing, to correct the docket record. A version of the Iridium slide 8, with the missing TV BAS allocations added, is attached as Figure 1. In contrast to the omitted Part 15 Wi-Fi, which is an unlicensed, unprotected, Part 15 use, TV BAS operations are a licensed Part 74 use, and therefore protected. In theory, at least, Section 15.5(b) of the FCC rules prohibits Part 15 operations from causing interference to licensed services. And, of course, Part 15 operations must accept any interference from licensed stations. This includes grandfathered TV BAS Channel A10. As documented by the attached Figure 2, TV BAS A10 operations are indefinitely grandfathered and co-primary with the Mobile Satellite Service (MSS).
4. Between co-primary users, the newcomer user has to demonstrate that it protects the incumbent user. As shown by the attached Figure 3, there are grandfathered A10 TV Pickup stations in many of the major population centers. Further, the Universal Licensing System (ULS) shows 565 licensed Channel A8 and A9 TV studio transmitter link (STL), Inter City Relay (ICR), TV Translator Relay and TV Pickup stations. Any AWS-5 ancillary terrestrial component (ATC) MSS use would be obligated to not deploy in the operational areas of these Channel A10 TV Pickup stations, in addition to demonstrating protection of grandfathered fixed-link A10 stations.
5. EIBASS is also providing the attached Figure 4 spectrum plot, which accurately shows the frequency breaks for the 2.5 GHz band.

II. Summary

6. Once again EIBASS is filing rebuttal *ex parte* comments, to correct a major error of omission in a filing to the IB Docket 13-213 proceeding.

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III. List of Figures

7. The following figures have been prepared as a part of these IB Docket 13-213 *ex parte* comments:

1. Corrected version of Iridium Slide 8
2. CFR excerpts documenting the regulatory status of grandfathered TV BAS Channel A10
3. Map showing operational areas of grandfathered TV BAS Channel A10 TV Pickup stations
4. An accurate (to scale) diagram of the 2.5 GHz band.

Respectfully submitted,

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July 18, 2014

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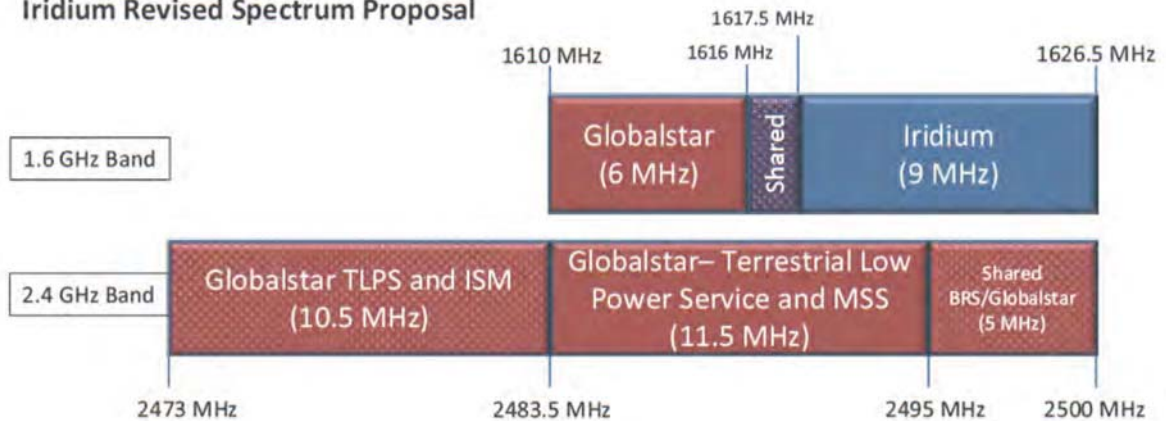
**EIBASS Ex Parte Comments To IB Docket 13-213,
Advanced Wireless Services 5/Terrestrial Low-Power Service (AWS-5/TLPS)**

More Accurate Version of Iridium Slide 8

from the July 9, 2014, Iridium ex parte filing to IB Docket 13-213 (Slide 8)

Questions?

Iridium Revised Spectrum Proposal



TV BAS Channel A9
2,467-2,483.5 MHz

Grandfathered TV BAS Channel A10
2,483.5–2,500 MHz

**EIBASS *Ex Parte* Comments To IB Docket 13-213,
Advanced Wireless Services 5/Terrestrial Low-Power Service (AWS-5/TLPS)**

Documentation Showing 2.5 GHz TV BAS Spectrum Allocation

Excerpt from 47 CFR Section 2.106 (Table of Frequency Allotments):

NG147 In the band 2483.5-2500 MHz, non-Federal stations in the fixed and mobile services that are licensed under 47 CFR parts 74, 90, or 101, which were licensed as of July 25, 1985, and those whose initial applications were filed on or before July 25, 1985, may continue to operate on a primary basis with the mobile-satellite and radiodetermination-satellite services, and in the sub-band 2495-2500 MHz, these grandfathered stations may also continue to operate on a primary basis with stations in the fixed and mobile except aeronautical mobile services that are licensed under 47 CFR part 27.

ELECTRONIC CODE OF FEDERAL REGULATIONS

e-CFR Data is current as of December 12, 2013

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Title 47: Telecommunication

PART 74—EXPERIMENTAL RADIO, AUXILIARY, SPECIAL BROADCAST AND OTHER PROGRAM DISTRIBUTIONAL SERVICES

Subpart F—Television Broadcast Auxiliary Stations

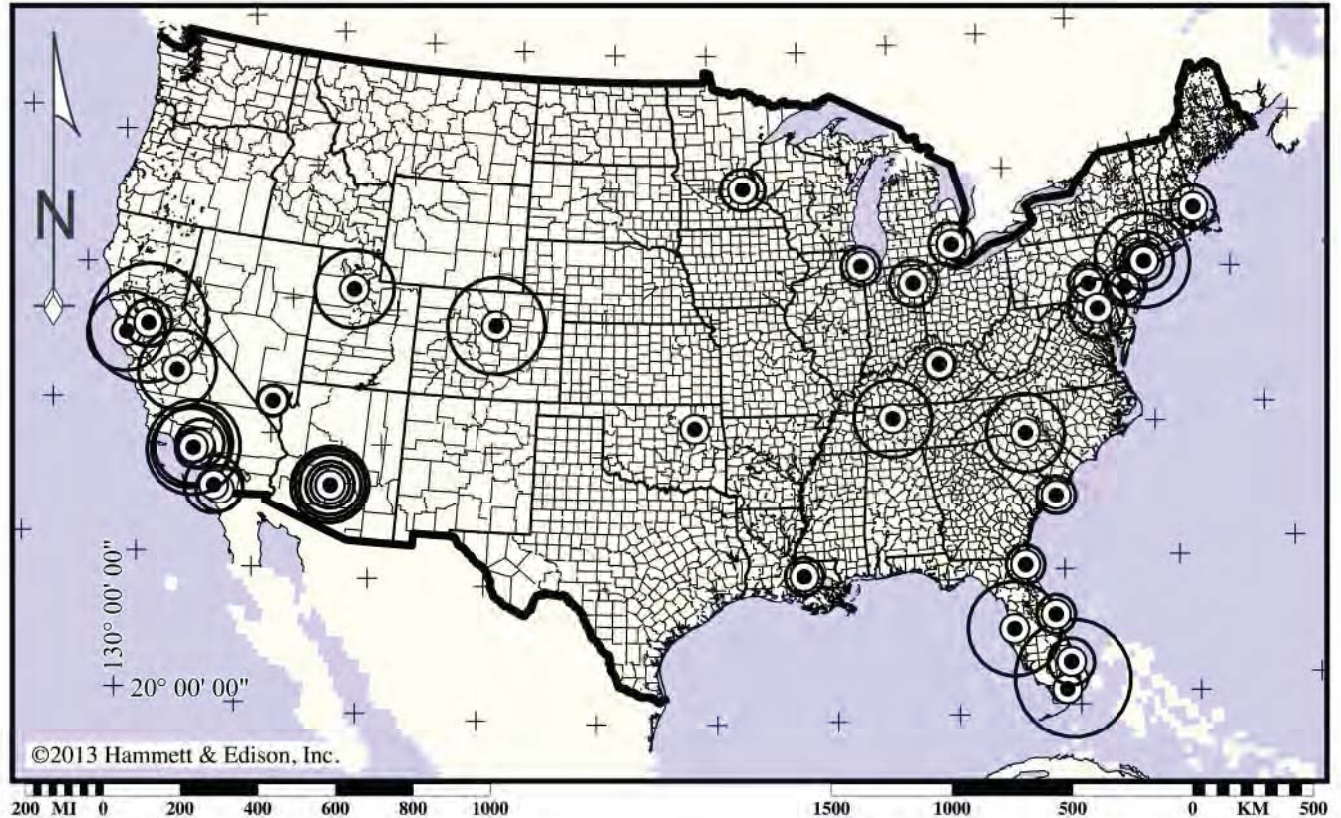
§74.602 Frequency assignment.

excerpt from 47 CFR Section 74.602(a)(2):

(2) In the band 2483.5-2500 MHz, no applications for new stations or modification to existing stations to increase the number of transmitters will be accepted. Existing licensees as of July 25, 1985, and licensees whose initial applications were filed on or before July 25, 1985, are grandfathered and their operations are on a co-primary basis with the mobile-satellite and radiodetermination-satellite services, and in the segment 2495-2500 MHz, their operations are also on a co-primary basis with part 27 fixed and mobile except aeronautical mobile service operations.

**EIBASS *Ex Parte* Filing to IB Docket 13-213
Terrestrial Low-Power Service/Advanced Wireless Services Band 5 (TLPS/AWS-5)**

Operational Areas of Grandfathered TV BAS Channel A10 TV Pickup Stations

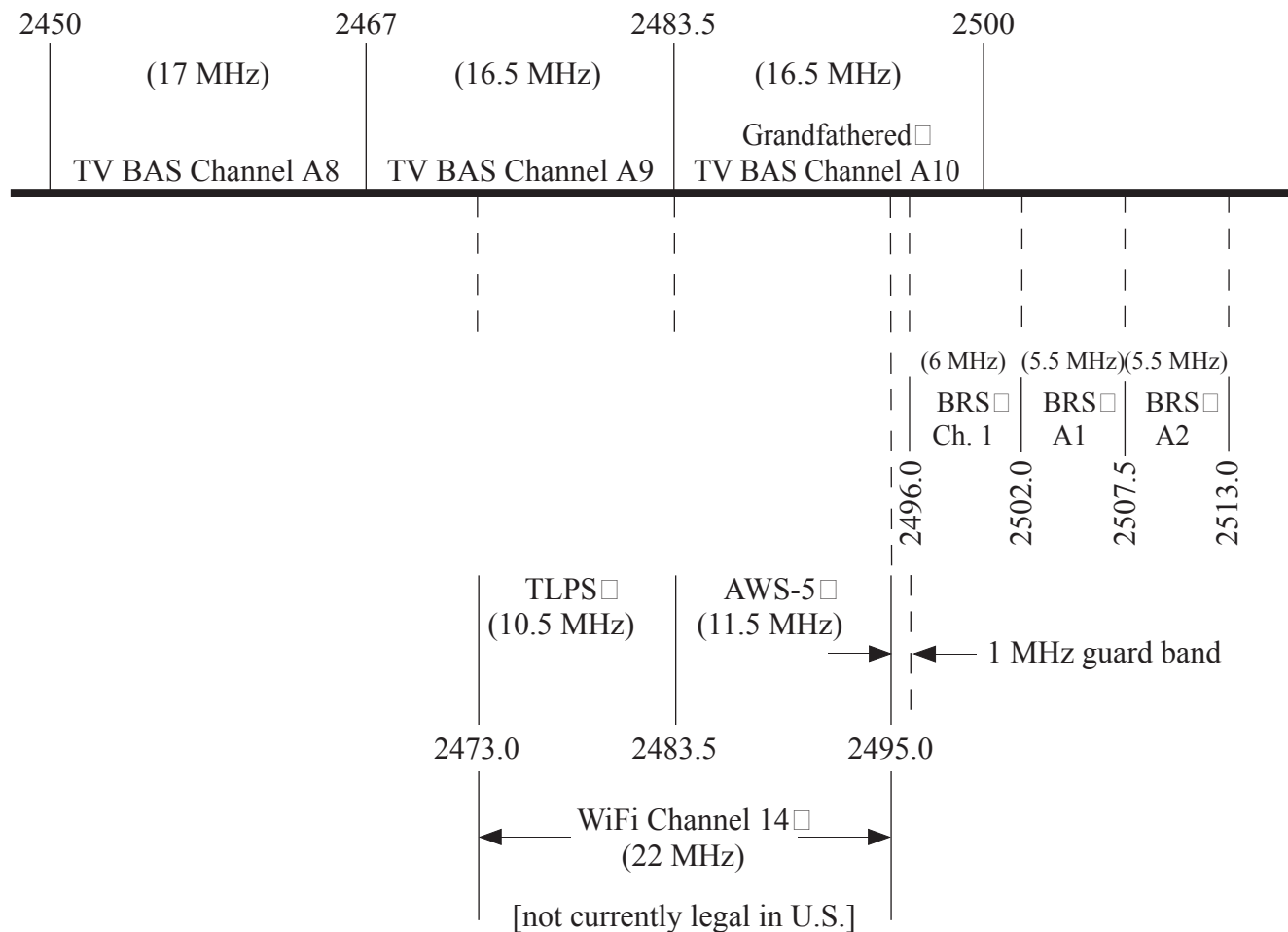


Operational areas of grandfathered TV BAS Channel A10 TV Pickup stations. Where the license specifies an ambiguous operational area, the U.S. Atlas reference coordinates for the parent TV station's city of license, and a radius of 90 km, have been used, as the Commission did in the WT Docket 10-153 "TV BAS Flexibility" rulemaking.

Azimuthal equidistant map projection. Map data taken from Sectional Aeronautical Charts, published by the National Ocean Survey. Geographic coordinate marks shown at 5-degree increments. City limits and county lines shown taken from U.S. Census Bureau TIGER/Line 2010 data.

**EIBASS *Ex Parte* Comments To IB Docket 13-213,
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2.5 GHz TV BAS Band



All frequencies are in MHz